

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION FOR A CRIMINAL COMPLAINT**

I, Mariano Garay-Ortiz, being first duly sworn, do here by depose and state that:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Customs and Border Protection Enforcement Officer with the Department of Homeland Security, assigned to investigate Immigration Law violations and Criminal Laws of the United States at the Luis Muñoz Marín International Airport, Carolina, Puerto Rico.

2. I make this affidavit based on my own personal knowledge and on oral and written reports by other federal, state, and/or local law enforcement agents and officers that investigated this matter. This affidavit does not contain all the information derived from this investigation only that which is sufficient to demonstrate probable cause to believe that a crime has been committed.

3. This affidavit is submitted in support of a criminal complaint charging Jesus Manuel ARIAS-LARA (“ARIAS-LARA”) with: (1) Re-entry after deportation in violation of 8 U.S.C. § 1326(a).

PROBABLE CAUSE

4. On or about December 23, 2024, at the Luis Muñoz Marín International Airport in Carolina, Puerto Rico, an alien by the name of Jesus Manuel ARIAS-LARA, a citizen of the Dominican Republic, was found in the United States attempting to board United Airline flight number UA 2219, bound to the city of Newark, NJ.

5. During the inspection conducted by the U.S. Customs and Border Protection Officers, the alien claimed to be a citizen of the United States by name of Bryan MENSION and presenting a Pennsylvania Driver’s License #56 281 472, as proof of identity.

6. The Driver’s License presented by the alien also contained his photograph and the document was issued under the name of Bryan MENSION.

7. ARIAS-LARA claimed to be the rightful bearer of the document.

8. Since the documents appeared to be fraudulent the inspection was referred for a closer examination.

9. During this process ARIAS-LARA fingerprints were submitted to the FBI for examination and comparison, this examination disclosed a match to a record of the FBI.

The FBI record revealed the following:

- a. On 10/03/1994, Mr. ARIAS-LARA was convicted for a Class D Misdemeanor conviction at the Worcester District Court, Massachusetts for Possession of Marijuana and Trespassing using the name of Daniel REYES.
- b. On 06/08/1999, Mr. ARIAS-LARA was arrested for a felony charge at the Providence / Bristol County Superior Court, Rhode Island for Manufacturing and Delivery Schedule I /II Control Substance, Heroin and Cocaine using the name of Daniel Reyes. Mr. ARIAS-LARA currently has an outstanding warrant for this case for this case in Rhode Island due to non-appearance.
- c. On August 20, 2001, Mr. ARIAS-LARA was Ordered Excluded or Deported from the United States by the Immigration Judge.
- d. On November 3, 2001, Mr. ARIAS-LARA was physically removed from the United States to the Dominican Republic, using name of Henry RAMIREZ ORTIZ.
- e. On January 4, 2015, Mr. ARIAS-LARA was apprehended by Border Patrol near Laredo, TX. The subject was served with a Notice of Intent / Decision to Reinstate Prior Order from the United States.
- f. On January 5, 2015, at the United States District Court for the Southern District of Texas Mr. ARIAS-LARA pleaded guilty to Title 8 United States code, section 1325(a)(1) (a Misdemeanor) and sentenced to serve sixty (60) days of incarceration. The federal case number is 5:15-PO-68-1.
- g. On March 17, 2015, Mr. ARIAS-LARA was physically removed from the United States to the Dominican Republic.

10. ARIAS-LARA was read his *Miranda* rights, and he waived his rights and agreed to be interviewed. During his immigration interview, ARIAS-LARA stated that his true and correct name is Jesus Manuel ARIAS-LARA, and that he is a national and citizen of the Dominican Republic.

11. As part of his removal procedure ARIAS-LARA was advised that after his deportation / removal from the United States, he was required to obtain permission from the Attorney General or his successor under the Department of Homeland Security prior to his re-embarkation at a place outside the United States or his application for admission.

12. I conducted records checks which reveal that no application to request permission on form I-212 had been filed on behalf of "Jesus Manuel ARIAS-LARA" at the Office of Citizenship and Immigration Services.


13. ARIAS-LARA is a citizen and national of the Dominican Republic and is an alien with no authorization or legal status to be present in the United States.

14. Further, ARIAS-LARA was deported from the United States and prohibited from re-entering the United States without obtaining consent from the Attorney General or his successor under the Department of Homeland Security prior to his re-embarkation at a place outside the United States or his application for admission.

CONCLUSION

15. Based upon my training, experience, and my participation in this investigation, I believe that probable cause exists that Jesus Manuel ARIAS-LARA attempted to enter the United States in violation of 8 U.S.C. § 1326 (a).

Respectfully submitted,


Mariano Garay-Ortiz
Enforcement Officer
Homeland Security Investigations

Sworn in accordance with the requirement of Fed. R. Crim. P. 4.1. by telephone at
on this 24 day of December 2024, in San Juan, Puerto Rico.

2:55 pm

  Digitally signed by
Hon. Giselle López-Soler
HON. Giselle López-Soler
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF PUERTO RICO